

EXHIBIT B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD/FM) Clerk's Certificate of Default
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This document relates to: Estate of John P. O'Neill, Sr., *et al.* v. The Republic of Iraq, *et al.*, 04-CV-1076 (GBD)

I, RUBY J. KRAJICK, Clerk of the United States District Court for the Southern District of New York, do hereby certify that this action was commenced on August 20, 2003 with the filing of the Complaint. The Third Amended Complaint was filed on June 7, 2005 and served on Defendants Islamic Republic of Iran, Iranian Ministry of Intelligence and Security, Iranian Minister of Intelligence and Security Ali Fallahian, Iranian Revolutionary Guard Corps, Iranian Revolutionary Guard Corps – QODS Force, Ayatollah Ali Hoseini-Khamenei, and Deputy Commander Brigadier General of the Iranian Revolutionary Guard Corp. Mohammed Baqr Zalqadr (collectively, "Iran"), as follows:

Service was effectuated by J. Michael McMahon, Clerk of Court for the Southern District of New York, by sending the Third Amended Complaint, Summons and Notice of Suit to Mr. Edward Betancourt, Director of Special Consular Services for the United States Department of State (the "State Department"), by registered mail, return receipt requested. On June 17, 2005, evidence of the State Department's transmission of the documents was filed with the Court. See 03-MD-1570, Docket Nos. 1127-1133. The O'Neill Plaintiffs filed their Affidavit of Service as to Iran and other supporting documentation with this Court on October 31, 2014. See MDL Docket No. 2906.

I further certify that the docket entries indicate that Iran did not file an answer or otherwise move with respect to the Third Amended Complaint. The default of Iran is hereby noted.

Dated: _____, 2015
New York, NY

RUBY J. KRAJICK
Clerk of the Court

By: _____
Deputy Clerk